

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: Sandra Elizabeth Russell)	
)	
<i>Sandra Elizabeth Puffenbarger, Sandra E. Russell, Sandra E. Smith, Sandra Elizabeth Smith, Sandra E. Herchenroeder, Sandy Russell, Sandra L. Smith</i>)	Case No. <u>13-35999-KLP</u>
)	
)	
)	Chapter <u>13</u>
Debtor(s))	
7595 Jericho Rd.)	
Ruther Glen, VA 22546)	
)	
)	
Last four digits of Social Security No(s): <u>0575</u>)	
)	
)	

NOTICE OF MOTION (OR OBJECTION)

Sandra Russell has filed papers with the court to Vacate the Order of Dismissal and Reinstate Case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion (or objection), or if you want the court to consider your views on the motion (or objection), then on or before 2/20/2014, you or your attorney must:

X File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court
701 East Broad St.
Richmond, VA 23219

You must also mail a copy to:

America Law Group, Inc.
t/a Debt Law Group

4036 Plank Rd, #10
Fredericksburg, VA 22407

- ☐ Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**
- X** Attend the hearing on the motion (or objection) scheduled to be held on February 26, 2014 at 12:00 p. m. at United States Bankruptcy Court, 701 East Broad Street, Ctrrm 5100 Richmond, VA 23219.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: 2/6/2014

Signature, name, address, and telephone
number of person giving notice:

/s/ Roger Hurwitz

Roger Hurwitz

America Law Group

4036 Plank Rd #10

Fredericksburg, VA 22407

Virginia State Bar No. 51016

Counsel for Sandra Russell

Certificate of Service

I hereby certify that I have this 6th day of February, 2014, mailed or hand-delivered a true copy of the foregoing Notice of Motion (or Objection) to all necessary parties.

/s/ Roger C. Hurwitz
Roger C. Hurwitz, Esq.

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:

Sandra Russell

13-35999-KLP
Chapter 13

Debtor(s)

MOTION TO VACATE ORDER OF DISMISSAL

To the Honorable Court:

The Debtor moves this Court as follows:

1. On 11/4/2013, the Debtor filed a voluntary petition in bankruptcy.
2. Debtor's first trustee payment was due by 12/4/2013.
3. Debtor did not make the first payment in a timely fashion, but first payment was posted on the trustee's site on 1/14/2014.
4. A certification of failure to commence payments was filed by the trustee on 1/6/2014.
5. Debtor is now current with payments due to trustee.
6. After having appeared at a Show Cause hearing before the court on 2/5/2014, the court dismissed the show cause in this matter.

WHEREFORE, Debtor requests that this Court vacate its order of dismissal and reinstate her Chapter 13 case to permit her to make payments to her creditors and complete her Chapter 13 bankruptcy.

Counsel for Sandra Russell, Debtor

Roger C. Hurwitz, Esquire
VSB 51016
America Law Group
t/a Debt Law Group
4036 Plank Rd #10
Fredericksburg, VA 22407
540-412-1463 (ph)
540-412-1465 (fax)

NOTICE IS HEREBY GIVEN PURSUANT TO LOCAL RULE 9013-1,
UNLESS A WRITTEN RESPONSE TO THIS MOTION AND SUPPORTING
MEMORANDUM ARE FILED WITH THE CLERK OF COURT AND SERVED ON
THE MOVING PARTY WITHIN FOURTEEN (14) DAYS OF THE SERVICE OF
THIS MOTION TO REINSTATE CHAPTER 13 CASE THE COURT MAY DEEM
ANY OPPOSITION WAIVED AND ISSUE AN ORDER SUSTAINING THE
MOTION WITHOUT FURTHER NOTICE OR HEARING.

SANDRA RUSSELL

Date: 2/6/2014

By /s/ Roger Hurwitz
Attorney for Debtor

Certificate of Service

I hereby certify that I have this 2/6/2014 mailed a true copy of the foregoing Notice of Motion and Hearing to Robert Hyman, Chapter 13 Trustee, P.O. Box 1780 Richmond, VA 23219-1780, The U.S. Trustee 701 E. Broad St., Ste.4304 Richmond, VA 23219, and all the creditors and necessary parties listed on the attached mailing list.

/s/ Richard C. Hurwitz

Richard C. Hurwitz

Creditors

America Law Group, Inc.
t/a Debt Law Group
2800 N Parham Rd, Ste 100
Henrico, VA 23294-0000

AT&T
208 S.Akard St
Dallas, TX 75202-0000

AT&T
attn: Bankruptcy Dep't
PO Box 755
Atwater, CA 95301-0000

Bon Secours Richmond Hlth Sys
PO Box 28538
Henrico, VA 23228-0000

Bon Secours Richmond Hlth Sys
St. Mary's Hospital
PO Box 28538
Henrico, VA 23228-0000

Bon Secours St. Mary's Hospital
c/o Patrick F. Heinen, Esq.
Spinella, Owings & Shaia, P.C.
8550 Mayland Dr.
Richmond, VA 23294-4704

Caroline County
Treasurer's Office
P. O. Box 431
Bowling Green, VA 22427-0000

CBHV Inc
PO Box 831
Newburgh, NY 12551-0831

Commonwealth Radiology, PC
1508 Willow Lawn Drive Ste 117
Richmond, VA 23230

Continental Emergency Physicians
111 Bulifants Blvd
Suite B
Williamsburg, VA 23188-5711

First Premier Bank
3820 N Louise Ave
Sioux Falls, SD 57107-0000

Fredericksburg Motor Cars
429 Jeff Davis Hghwy
Fredericksburg, VA 22401-0000

Monroe & Main
c/o Creditors Bankruptcy Service
P.O. Box 740933
Dallas, TX 75374

Pellettieri
991 Oak Creek Dr
Lombard, IL 60148-0000

Pmab Srvc
5970 Fairview Rd Ste 800
Charlotte, NC 28210-0000

Rappahannock Electric Co-op
Debt Recovery Department
PO Box 7388
Fredericksburg, VA 22404-7388

Seventh Ave
1112 7th Ave
Monroe, WI 53566-0000

Southwest Credit Syste
4120 International Pkwy
Suite 1100
Carrollton, TX 75007-0000

Spinella, Owings & Shaia
8550 Mayland Dr, Ste 1
Henrico, VA 23294-0000

Titlemax of Virginia
dba TitleMax
5203 Jefferson Davis Highway
Fredericksburg, VA 22408-0000